Intermec Technologies Corp. v. Palm, Inc.
Doc. 169 Att. 1

EXHIBIT B

Dockets.Justia.com

Perkins Coie

Four Embarcadero Center, Suite 2400
San Francisco, CA 94111-4131
415-344-7000
415-344-7050
www.perkinscoie.com

M. Christopher Jhang
PHONE: (415) 344-7126
EMAIL: CJhang@perkinscoie.com

April 26, 2007

VIA FACSIMILE

Lester Levy, Esquire
Michele Raphael, Esquire
Wolf Popper LLP
845 Third Avenue
New York, NY 10022-6601

RE: ***CLRB Hanson Industries, LLC, et al. v. Google, Inc.***
Case No. C 05-03649 JW

Dear Mr. Levy and Ms. Raphael:

Our client has completed its review of the deposition transcripts of witnesses Heather Wilburn, Shivakumar Venkataraman, and Michael Schulman. We have prepared tailored confidentiality designations for each of these transcripts. These designations are as follows:

Wilburn transcript
Confidential-Trade Secret/Attorneys' Eyes Only — None.

Confidential — 23:22 – 33:12; 34:23 – 36:23; 37:12 – 39:12; 45:22 – 46:18; 48:21 – 51:6; 62:11-14; 63:18 – 67:13; 69:8 – 70:11; Exhibits 2 & 3 (The materials and issues discussed in this portion are not available to the public, and are thus, confidential).

Non-confidential — All other portions of the transcript.

Venkataraman transcript
Confidential-Trade Secret/Attorneys' Eyes Only — None.

Confidential — Entire transcript. (All issues discussed by this Google engineer in this deposition reflect Google's internal processes and are not publicly available).

Non-confidential — None.

41063-0023/LEGAL13193088.1

Schulman transcript
Confidential-Trade Secret/Attorneys' Eyes Only — 48:5-15 (The issues discussed in this portion pertain to Google's business practices, and are thus, highly confidential).

Confidential — All other portions of the transcript. (All other issues discussed by this Google engineer in this deposition reflect Google's internal processes and are not publicly available).

Non-confidential — None.

We will be notifying the reporter of these designations and requesting that they prepare final transcripts on an expedited basis.

Very truly yours,

M. Christopher Jhang

cc: Ken Sorkin (via facsimile)